

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ANNA PATRICK, ET AL., individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

DAVID L. RAMSEY, III, individually; HAPPY
HOUR MEDIA GROUP, LLC, a Washington
limited liability company; THE LAMPO
GROUP, LLC, a Tennessee limited liability
company,

Defendants.

Case No.: 2:23-cv-00630 JLR

**DECLARATION OF JACK M.
LOVEJOY IN SUPPORT OF
DEFENDANT HAPPY HOUR MEDIA
GROUP, LLC'S RENEWED MOTION
TO DISMISS PLAINTIFFS' AMENDED
COMPLAINT**

NOTED ON MOTION CALENDAR:

JANUARY 26, 2024

Jack M. Lovejoy states and declares as follows:

1. I am an attorney at Corr Cronin LLP, attorneys of record for Defendant Happy Hour Media Group, LLC in the above-captioned matter. I am over eighteen years of age, competent to testify and submit this declaration based upon personal knowledge in support of Happy Hour Media Group, LLC's Motion to Dismiss.

2. Attached hereto as **Exhibit A** is a true and correct copy of the Complaint filed in *State of Washington v. Reed Hein & Associates, LLC, et al.*, King County Superior Court Case No. 20-2-03141-1 SEA.

DECLARATION OF JACK M. LOVEJOY IN SUPPORT OF
DEFENDANT HAPPY HOUR MEDIA GROUP, LLC'S
RENEWED MOTION TO DISMISS PLAINTIFFS'
AMENDED COMPLAINT - Case No.: 2:23-cv-00630 JLR - 1

CORR CRONIN LLP
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DATED this 4th day of January, 2024 at Seattle, Washington.

Jack M. Lovejoy, WSBA No. 36962

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CERTIFICATE OF SERVICE

I hereby certify that on January 4, 2024, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

s/ Wen Cruz
Wen Cruz

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